CLEARINGHOUSE RULE 98–152

Comments

[<u>NOTE</u>: All citations to "Manual" in the comments below are to the <u>Administrative Rules Procedures Manual</u>, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

2. *Form, Style and Placement in Administrative Code*

SECTION 5 includes amendments to ss. ATCP 11.14 (2), 12.02 (2m) (a) and (b) and 12.03 (2m) (a) and (b). Because these are not consecutively numbered rules sections which are affected in their entirety, they cannot be included in the same SECTION. The material in SECTION 5 should be divided into three SECTIONS. [See s. 1.04 (2) (a) 3. and 4., Manual.]

3. *Conflict With or Duplication of Existing Rules*

Because all exemptions from fees for owners of farm-raised deer herds are eliminated by the rule, the second sentence of s. ATCP 10.652 (4) (intro.) should be amended as follows: "The application shall be accompanied by the fee, if any, that is required under sub. (5)."

4. *Adequacy of References to Related Statutes, Rules and Forms*

In the first sentence of the "Approved Feedlot Permits" portion of the analysis, the reference to "s. 95.751 (2) (d), Wis. Stats." should be changed to "s. 95.715 (2) (d), Wis. Stats."

5. *Clarity, Grammar, Punctuation and Use of Plain Language*

a. The first paragraph of the analysis indicates that "It [i.e., the proposed rule] . . . exempts owners of certified . . . herds from paying registration fees." To the contrary, the rule

eliminates the exemption for owners of certified herds. In order to remedy this inconsistency, the phrase "1998, and exempts" should be changed to "1998, and which exempt."

 b. In the first sentence of the "Livestock Markets Licenses" portion of the analysis, the reference to "s. 12.02 (2m)" should be changed to "s. ATCP 12.02 (2m)."

 c. In s. ATCP 12.02 (2m) (b), a period should be inserted after "sub".